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February 6, 2006

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 445 12th Street, SW, Room 8B201 Washington, DC 20554

Re: Cox Communications, Inc. and its Affiliates

Certification of CPNI Filing (February 6, 2006)

File No. EB-06-TC-060

Dear Ms. Dortch:

In accordance with the requirements of the Commission's February 6, 2006 *Public Notice*¹ in this matter, Cox Communications, Inc. hereby submits its CPNI compliance certification for its operations and the operations of its affiliates.

Please inform me if any questions should arise in connection with this submission

Respectfully submitted,

J.G. Harrington

Counsel to Cox Communications, Inc.

JGH/vll

Attachment

cc (w/ att.): Byron McCoy

Best Copy and Printing

¹ "Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications," *Public Notice*, DA 06-223 (rel. Jan. 30, 2006) (the "*Public Notice*").

CPNI COMPLIANCE ANNUAL OFFICER CERTIFICATION

As set forth in the Federal Communication Commission's ("FCC") rules regarding Customer Proprietary Network Information ("CPNI"), 47 C.F.R. §64.2009 (hereinafter the "CPNI Rules"), telecommunications carriers are required to implement safeguards for the use of CPNI and have an officer, as an agent of the carrier, sign an annual compliance certificate stating that the company has established operating procedures that are adequate to ensure compliance with the CPNI Rules. The carrier must also provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the CPNI Rules.

Based upon the results of an audit of the CPNI operating procedures followed by each Cox Telcom entity that provides telephone service to residential and/or business customers from January 1, 2005 through December 31, 2005, I certify that I have personal knowledge that the Cox Telecom entities have established operating procedures that are adequate to ensure compliance with the CPNI Rules. The accompanying CPNI compliance certification statements signed by the Vice Presidents of Marketing, Human Resources, and Customer Care for each Cox Telcom entity explain the procedures followed by each entity with respect to CPNI and any deviations therefrom. The Supporting Statement further explains Cox's CPNI compliance procedures.

Carrington F Phillip

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Date **7.**///06

CPNI Compliance Supporting Statement

The following statement is provided pursuant to 47 U.S.C. §64.2009(e) to explain how the operating procedures of the entities certified ensure compliance with the applicable rules affecting use of customer proprietary network information.

Customer CPNI Approval Status.

Documentation of customer CPNI permission is maintained in the individual customer's account file in the Cox ICOMS billing and account system.

Training.

A CPNI training course must be passed by all employees and contractors with access to CPNI. Compliance for employees is tracked through Cox University and all contractors must certify that their employees have taken and passed the course. All new hires who use CPNI information for sales or marketing activities must take the training prior to accessing or using any Cox telephone customer's CPNI.

Sales/Marketing Campaigns and Supervisory Review.

Cox operating systems are now each responsible for maintaining records of all Cox sales and marketing campaigns that use Cox customer's CPNI. In addition, records are maintained of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI (e.g. telemarketing vendors, business partners, etc.). The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. These records are maintained for a minimum of one year. A disciplinary process exists for those persons who fail to comply with Cox's CPNI procedures.

Each system also has a supervisory review process to ensure compliance with CPNI restrictions when conducting outbound marketing. Records of compliance with this requirement are maintained a minimum of one year.

Annual Certification Process.

The following procedures are followed to ensure our systems are in compliance with the annual certification process.

- 1. The VP's of HR, Marketing and Customer Care sign a "CPNI Compliance Certificate" certifying that their system is in compliance with the CPNI rules, and noting those instances, if any, when they were not in compliance. Each Cox system in a state prepares a separate certification.
- 2. Carey Phillip, V.P. of Regulatory, as an officer of each of the Telcom companies, signed the 2005 annual officer certification stating based upon the results of an audit of the CPNI operating procedures followed by each Cox Telcom entity that

provides telephone service to residential and/or business customers from January 1, 2005 through December 31, 2005, he has personal knowledge that the Cox Telecom entities have established operating procedures that are adequate to ensure compliance with the CPNI Rules.

- 3. A copy of all system CPNI Compliance Certificates and the Annual Officer Certification is kept on file in Cox's Headquarters location in Atlanta, Georgia. Cox is providing these documents to the FCC pursuant to its direction published on January 30, 2006.
- 4. Training records for CPNI and a copy of the signed CPNI Compliance Certificates are maintained at each system.
- 5. All employees subject to CPNI will be required to take an updated CPNI course when any changes in the law occur, or at the system's discretion, annually. Cox Legal will notify the Systems of any changes in the law that necessitates additional CPNI training.
- 6. All new hires subject to CPNI receive the training prior to accessing or using any CPNI.
- 7. Detailed customer calling records, which are considered particularly confidential, are accessible only by a central group and provided to customers only after receipt of a signed release or accessing the customer's password protected online account.



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

On behalf of Cox Telcom Louis, AVA [Insert State where System located], L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by

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On behalf of Cox Telcom, Florida, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

(Please Check Each Required Procedure Implemented)

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Dire	ector, Human Resources & Development	Director, Marketing & Sales	VP & General Manager - Central Florida	
Title		Title	Title	
Dec	ember 1, 2005	December 1, 2005	December 1, 2005	
Date		Date	Date	



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On behalf of Cox Nebraska Telcom, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

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On cert	behalf of Cox Telcom AZ [Insert State where System located], L.L.C. d/b/a as Cox Communications ("Cox"), we ify that Cox maintained the following procedures during the period of January 1, 200 through December 31, 200 to ensure Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any eptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by
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Sig	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional area noted below in each Cox system that offers Cox Digital Telephone® service. Marketing Customer Care Marketing Signature Kevin Moran MICHAEL PERRY LEE R SCANIZANO Printed Name Printed Name VP, MARKETING VP, CUSTOMER CARE Title Title
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On behalf of Cox Telcom Nevada [Insert State where System located], L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 200 5 through December 31, 200 5 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

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$\frac{1}{T_{ii}}$	Director Human Presources Director Marketing & Sales Director of Customer CARE		
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a	Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns where CPNI was disclosed or provided to third parties, such as Cox vendors or business partners. These records include a description of each campaign, the specific CPNI used in the campaign, and what products and services were offered as part of the campaign. (List any deviations to this policy and the corrective actions that were taken.)
9 ′	Marketing and Sales Activities. All outbound marketing campaigns using CPNI were reviewed and approved, prior to being distributed to Cox phone customers, by system supervisory personnel trained on the application of the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.)
17.	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional area noted below in each Cox system that offers Cox Digital Telephone® service.
н	Marketing Customer Care
Sig	SHARON SMUTH Signature Signature Signature KARON A. KRANICK
Pri	Printed Name Printed Name IP Iliur KOX 20 X Solve VP Custom Demartus
Tit	VI II MIGHT MADE
Da	11/18/0-0



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

On behalf of Cox Telcom Oklahoma, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 200___ through December 31, 200__ to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

(Please Check Each Required Procedure Implemented) CPNI Approval Status. Cox maintains a record of a customer's opt-in or opt-out consent, as appropriate, in the customer's internal records. (Please detail any deviations from this policy.) CPNI Training. Cox personnel who have access to Cox phone customers' CPNI information have received training on when they are, and are not, authorized to use CPNI information. Cox has disciplinary process in place for personnel who inappropriately use CPNI information. (Please detail any deviations from this policy.) Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns that use CPNI information. All such campaigns were directed only to telephone customers that gave Cox opt-in or opt-out consent as appropriate, to use such information. The only exception to this statement is some campaigns were targeted to subscribers when the service being marketed met a specific exemption set forth in the (List any deviations to this policy and the corrective actions that were taken.) Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns where CPNI was disclosed or provided to third parties, such as Cox vendors or business partners. These records include a description of each campaign, the specific CPNI used in the campaign, and what products and services were offered as part of the campaign. (List any deviations to this policy and the corrective actions that were taken.) Marketing and Sales Activities. All outbound marketing campaigns using CPNI were reviewed and approved, prior to being distributed to Cox phone customers, by system supervisory personnel trained on the application of the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.) This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional area noted below in each Cox system that offers Cox Digital Telephone® service. Marketing Human Resource **Customer Care** Signature Signature gnature Donna Miller Mollie Andrews Shelli R Osborn Printed Name Printed Name Printed Name VP Marketing VP Customer Care VP Human Resources Title Title 12/21/05

Date

Date



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

On behalf of Cox Iowa Telcom, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

X	(Please Check Each Required Procedure Implemented) CPNI Approval Status. Cox maintains a record of a customer's opt-in or opt-out consent, as appropriate, in the customer's internal records.			
	(Please detail any deviations from this policy.))		_
×	CPNI Training. Cox personnel who have account, authorized to use CPNI information. Cox (Please detail any deviations from this policy.)	has disciplinary process in place fo	NI information have received training on when they are, and for personnel who inappropriately use CPNI information.	i are
¤	were directed only to telephone customers that	t gave Cox opt-in or opt-out conser geted to subscribers when the serv	ring campaigns that use CPNI information. All such campaent as appropriate, to use such information. The only exceptivice being marketed met a specific exemption set forth in	otion
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Ħ	Marketing and Sales Activities. All outbound phone customers, by system supervisory person (List any deviations to this policy and the corresponding to the	nnel trained on the application of th	I were reviewed and approved, prior to being distributed to the CPNI rules.	- - Cox
Sig	Noted below in e Human Resources Noted below in e Many Borches Signature ANN BORCHES Printed Name V. P. ARR Title Title	st be signed by the Vice Presidence Cox system that offers Cox larketing Many Many Marketing Many Marketing Marketing	Signature Printed Name V. A. CUST ONER CARE Title	- 'ea
Da	12-7-05 Date Do	/2///03 ate	Date 12/1/05	-



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

On behalf of Cox Telcom California, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 200 5 through December 31, 200 5 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

(Please Check Fach Required Procedure Implemented)

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phone customers, by system supervisory	personnel trained on the application of the	ere reviewed and approved, prior to being distributed to Cox CPNI rules.		
This CPNI Compliance Certificate noted below man Resources MANUAL MANUA	e must be signed by the Vice Presider in each Cox system that offers Cox Marketing Signature ALTHUR B. KEYNOLS Printed Name VP-MARKETNG Title	nt (or if none, the Director) of each functional area Digital Telephone® service. Customer Care Signature Debarah Lawrence Printed Name VP Customer Care Title		
	CPNI Training. Cox personnel who has not, authorized to use CPNI information. (Please detail any deviations from this power directed only to telephone customet to this statement is some campaigns we CPNI rules. (List any deviations to this policy and the marketing and Sales Activities. Cox may parties, such as Cox vendors or busine campaign, and what products and service (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers, by system supervisory (List any deviations to this policy and the phone customers).	Marketing and Sales Activities. Cox maintains records of all sales and marketing parties, such as Cox vendors or business partners. These records include a descampaign, and what products and services were offered as part of the campaign. (List any deviations to this policy and the corrective actions that were taken.) Marketing and Sales Activities. All outbound marketing campaigns using CPNI w phone customers, by system supervisory personnel trained on the application of the (List any deviations to this policy and the corrective actions that were taken.) This CPNI Compliance Certificate must be signed by the Vice Preside noted below in each Cox system that offers Cox Marketing This CPNI Compliance Certificate must be signed by the Vice Preside noted below in each Cox system that offers Cox Marketing Signature Liday H. Marketing Printed Name VP. Marketing VP. Marketing		

Date



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

On behalf of Cox Telcom Virginia [Insert State where System located], L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 200___ through December 31, 200_ that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by

Co	x. (Please Check Each Required Procedure Implemented)
5	CPNI Approval Status. Cox maintains a record of a customer's opt-in or opt-out consent, as appropriate, in the customer's internal records. (Please detail any deviations from this policy.)
<u> </u>	CPNI Training. Cox personnel who have access to Cox phone customers' CPNI information have received training on when they are, and are not, authorized to use CPNI information. Cox has disciplinary process in place for personnel who inappropriately use CPNI information. (Please detail any deviations from this policy.)
B	Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns that use CPNI information. All such campaign were directed only to telephone customers that gave Cox opt-in or opt-out consent as appropriate, to use such information. The only exception to this statement is some campaigns were targeted to subscribers when the service being marketed met a specific exemption set forth in the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.)
b	<u></u>
ď	Marketing and Sales Activities. All outbound marketing campaigns using CPNI were reviewed and approved, prior to being distributed to Cosphone customers, by system supervisory personnel trained on the application of the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.)
Н	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional area noted below in each Cox system that offers Cox Digital Telephone® service. Suman Resources Marketing Customer Gare
a	gnature Signature Signature Signature Signature Signature Signature Signature David T. Bifthe Printed Name Printed Name Printed Name VP & Customer Care Title Title
10	2-16-05 12-16-65 12-6-05 Date Date

The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Support/Telephony/Telephony.htm.

On behalf of Cox Louisiana Telcom, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

	(Please Check Each Required Proce	dure Implemented)
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CPNI Training. Cox personnel word, authorized to use CPNI inform	ation. Cox has disciplinary process in place	NI information have received training on when they are, and are for personnel who inappropriately use CPNI information.
were directed only to telephone or to this statement is some campais CPNI rules.	stomers that gave Cox opt-in or opt-out cons	ting campaigns that use CPNI information. All such campaign ent as appropriate, to use such information. The only exception rvice being marketed met a specific exemption set forth in th
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phone customers, by system superv	Il outbound marketing campaigns using CPN isory personnel trained on the application of and the corrective actions that were taken.)	II were reviewed and approved, prior to being distributed to Conthe CPNI rules.
This CPNI Compliance Cert noted	below in each Cox system that offers C Marketing	ident (or if none, the Director) of each functional area Cox Digital Telephone® service. Customer Care
Signature Andy Rice Printed Name	Signature Signature Jason Furrate Printed Name	Signature (Tom Makin Printed Name
VP Human Resources Greater Louisiana Tule 12-28-05	Greater Louisiana Title 12-28-05	VP Customer Care Greater Louisiana Title 13/28/05
13-24-03	Date	Date



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supportt/Telephony/Telephony.htm.

On behalf of Cox Telcom Ohio, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

(Please Check Each Required Procedure Implemented)

(Please detail any deviations from the		50 050			's internal records.
CPNI Training. Cox personnel who not, authorized to use CPNI informat	ion. Cox has disciplin	phone customers' CP? nary process in place f	NI information have for personnel who in	e received training on nappropriately use CP	when they are, and ar NI information.
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	low in each Cox sy	d by the Vice Presi	ox Digital Telep	hone® service.	nch functional area
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11-26-05	Date	[03	Date	. 28.05	



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supportt/Telephony/Telephony.htm.

On behalf of Cox Telcom [Insert State where System located], L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

(Please Check Each Required Procedure Implemented)

	NO DEVIATION
7	CPNI Training. Cox personnel who have access to Cox phone customers' CPNI information have received training on when they are, and not, authorized to use CPNI information. Cox has disciplinary process in place for personnel who inappropriately use CPNI information.
	(Please detail any deviations from this policy.) NO DEVIATION
×	Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns that use CPNI information. All such campai were directed only to telephone customers that gave Cox opt-in or opt-out consent as appropriate, to use such information. The only except to this statement is some campaigns were targeted to subscribers when the service being marketed met a specific exemption set forth in CPNI rules.
	(List any deviations to this policy and the corrective actions that were taken.)
×	Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns where CPNI was disclosed or provided to the parties, such as Cox vendors or business partners. These records include a description of each campaign, the specific CPNI used in campaign, and what products and services were offered as part of the campaign. (List any deviations to this policy and the corrective actions that were taken.)
	Marketing and Sales Activities. All outbound marketing campaigns using CPNI were reviewed and approved, prior to being distributed to C
¥	phone customers, by system supervisory personnel trained on the application of the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.)
×	phone customers, by system supervisory personnel trained on the application of the CPNI rules.
×	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional are noted below in each Cox system that offers Cox Digital Telephone® service.
	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional are noted below in each Cox system that offers Cox Digital Telephone® service. Marketing Customer Care LHWoxxland LHWoxxland Marketing Marketing Marketing LHWoxxland LHWoxxland LHWoxxland LHWoxxland Marketing Marketing
	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional are noted below in each Cox system that offers Cox Digital Telephone® service. Marketing Customer Care LHWoxxland LHWoxxland Marketing Marketing Marketing LHWoxxland LHWoxxland LHWoxxland LHWoxxland Marketing Marketing



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

On behalf of Cox Telcom Rhode Island, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 200 through December 31, 200 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

pro	cedures are listed below, along with an explanation of any corrective measures undertaken by Cox. (Please Check Each Required Procedure Implemented)
√	CPNI Approval Status. Cox maintains a record of a customer's opt-in or opt-out consent, as appropriate, in the customer's internal records. (Please detail any deviations from this policy.) Records are maintained in our ICOMS billing system.
- 3	
√	CPNI Training. Cox personnel who have access to Cox phone customers' CPNI information have received training on when they are, and are not, authorized to use CPNI information. Cox has disciplinary process in place for personnel who inappropriately use CPNI information. (Please detail any deviations from this policy.)
	The new training has only been introduced to those individuals who have access to CPNI <u>and</u> sell/market Cox products per the attached decision matrix. An attached document identifies those individuals in the call center and sales who have not yet taken the new training. Though FSRs are covered under the CPNI permission granted to the CSRs and have had prior training on CPNI, we are in the process of having all FSRs recertified using the revised CPNI training for awareness purposes only.
√	Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns that use CPNI information. All such campaign were directed only to telephone customers that gave Cox opt-in or opt-out consent as appropriate, to use such information. The only exception
	to this statement is some campaigns were targeted to subscribers when the service being marketed met a specific exemption set forth in the CPNI rules.
	(List any deviations to this policy and the corrective actions that were taken.)
	The above is correct for sales campaigns.
y <u>3</u>	parties, such as Cox vendors or business partners. These records include a description of each campaign, the specific CPNI used in the campaign, and what products and services were offered as part of the campaign. (List any deviations to this policy and the corrective actions that were taken.) The above is correct for sales campaigns.
₫	Marketing and Sales Activities. All outbound marketing campaigns using CPNI were reviewed and approved, prior to being distributed to Corphone customers, by system supervisory personnel trained on the application of the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.) The above is correct for sales campaigns.
	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional area noted below in each Cox system that offers Cox Digital Telephone® service. Ultrack & Warketing Customer Care Customer Care
Sig	Signature Deboyoh B. Wikon Descens Studies Signature Signature Signature Signature Signature Signature Signature Signature Printed Name Printed Name
Tit	VP Human Resources UP marketing V.P. Operations
Da	12/21/05 12/21/05 Date Date



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

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The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Support/Telephony/Telephony.htm.

On behalf of Cox Telcom Louisiana, L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

,		(Please Check Each	Required Procedure	Implemented)		
CPNI Approval State (Please detail any de		as a record of a customers policy.)	r's opt-in or opt-out cor	sent, as appropriate,	in the customer's in	nternal records.
CPNI Training. Conot, authorized to use (Please detail any de	e ČPNI information	have access to Cox phoon. Cox has disciplinary	one customers' CPNI in y process in place for po	formation have rece ersonnel who inappro	ived training on whopriately use CPNI	en they are, and are information.
were directed only to to this statement is CPNI rules.	o telephone custos some campaigns	maintains records of al mers that gave Cox opt- were targeted to subscr the corrective actions the	in or opt-out consent a ribers when the service	s appropriate, to use	such information.	The only exception
parties, such as Cox campaign, and what	vendors or bus products and serv	maintains records of a iness partners. These ices were offered as par the corrective actions the	records include a descript of the campaign.	campaigns where Claription of each cam	PNI was disclosed on a paign, the specific	or provided to third CPNI used in the
phone customers, by	system superviso	outbound marketing cam ry personnel trained on the corrective actions th	the application of the C	re reviewed and app. PNI rules.	roved, prior to being	g distributed to Cox
This CPNI Comp	pliance Certific noted be	ate must be signed be owin each Cox system Marketing	oy the Vice Presiden em that offers Cox I	t (or if none, the ligital Telephone	® service.	functional area
Kitta D. Bilwit Signature Robin D. Bre Printed Name	wton Llum Pour	Signature Roberts D Printed Name	Beny Jr.	ignature CAYhery Printed Nan		t Freeman
lice President of Title 12/30/05 Date	TUMAN KES	U(C) Descrot - C Title 12/3/05 Date	USTOMER CARE	Title 12 3	0/05	rkenny



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that provide non-communications related services (e.g. Cox cable, Digital Cable, etc.). Examples of CPNI include who, when and where a customer calls; how much a customer spends on phone calls; the phone services subscribed to or used; price plans; billing information; and related phone information. The CPNI laws impact how Cox uses CPNI to market and sell Cox video, high speed internet, and additional telephone services. A subscriber's name, address and phone number (if published) is not CPNI. For more details about the CPNI rules, visit the Cox Legal Department's website on the CCI Intranet at the following address: http://axis.cci.cox.com/catllegal/Operations%20Product%20Supporrt/Telephony/Telephony.htm.

On behalf of Cox Georgia Telcom L.L.C. d/b/a as Cox Communications ("Cox"), we certify that Cox maintained the following procedures during the period of January 1, 2005 through December 31, 2005 to ensure that Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any exceptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by Cox.

(Please Check Each Required Procedure Implemented) CPNI Approval Status. Cox maintains a record of a customer's opt-in or opt-out consent, as appropriate, in the customer's internal records. (Please detail any deviations from this policy.) CPNI Training. Cox personnel who have access to Cox phone customers' CPNI information have received training on when they are, and are not, authorized to use CPNI information. Cox has disciplinary process in place for personnel who inappropriately use CPNI information. (Please detail any deviations from this policy.) Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns that use CPNI information. All such campaigns were directed only to telephone customers that gave Cox opt-in or opt-out consent as appropriate, to use such information. The only exception to this statement is some campaigns were targeted to subscribers when the service being marketed met a specific exemption set forth in the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.) Marketing and Sales Activities. Cox maintains records of all sales and marketing campaigns where CPNI was disclosed or provided to third parties, such as Cox vendors or business partners. These records include a description of each campaign, the specific CPNI used in the campaign, and what products and services were offered as part of the campaign. (List any deviations to this policy and the corrective actions that were taken.) Marketing and Sales Activities. All outbound marketing campaigns using CPNI were reviewed and approved, prior to being distributed to Cox phone customers, by system supervisory personnel trained on the application of the CPNI rules. (List any deviations to this policy and the corrective actions that were taken.) This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional area noted below in each Cox system that offers Cox Digital Telephone® service. **Human Resources** Marketing STEAMEN Printed Name Printed Name Title Title



The federal laws governing the use and disclosure of residential and business telephone customers' network information (also known as "CPNI" or Customer Proprietary Network Information) require that all telecommunications carriers establish effective safeguards to protect against unauthorized access to CPNI by their employees, agents, or unaffiliated third parties or affiliated companies that n;

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that exc	behalf of Cox Telcom \(\sqrt{\alpha}\) [Insert State where System located], L.L.C. d/b/a as Cox Communications ("Cox"), we tify that Cox maintained the following procedures during the period of January 1, 200 through December 31, 200 to ensure Cox safeguards its telephone customers' CPNI information as mandated by the FCC's rules set forth in 47 C.F.R. §64.2009. Any eptions or deviations to Cox's procedures are listed below, along with an explanation of any corrective measures undertaken by c.
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	This CPNI Compliance Certificate must be signed by the Vice President (or if none, the Director) of each functional area
т	noted below in each Cox system that offers Cox Digital Telephone® service.
n	uman Resources Marketing Customer Care
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